

FLORENCE COPPER INC.

1575 W. Hunt Highway, Florence, Arizona 85132 USA

florencecopper.com

December 22, 2021

Mr. David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne St
San Francisco, CA 94105

Subject: 30-day Notification Report for AL Exceedance for Sulfate at Operational Monitor Well MW01-O

Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1

Dear Mr. Albright:

Florence Copper is providing this 30-day notification report following an alert level (AL) exceedance for sulfate at operational monitor well MW01-O under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit). The required 5-day notification was provided on December 8th.

As required under Part II.H.2.a.iv.A of the Permit, Florence Copper has evaluated the cause and impacts of the exceedance and reviewed mitigation strategies. No malfunction of pollution control devices or other equipment or process occurred that contributed to the alert level exceedance. Hydraulic control has been maintained as required by the permit throughout operation of the PTF and continues today. No other parameters exceeded their respective alert levels.

MW01-O is located northwest of Florence Copper's Production Test Facility (PTF) Wellfield. The closest oxide observations wells are M57-O to the southeast, and M58-O to the northeast. Both wells' sulfate concentrations are below their respective ALs. Monitor wells M54-O and M22-O, downgradient from MW01-O, also show sulfate concentrations below their ALs.

Florence Copper is currently in the rinsing phase of operations and has been redeveloping injection, recovery, and observation wells to improve well efficiency. Recovery wells R-01, R-08, and R-07 in the northwest section of the wellfield were redeveloped in November. Redevelopment consists of brushing the well screens and airlifting to remove mineral precipitates which occur as the pH increases.

In December, mitigation efforts included increasing recovery flows on the northwest side of the wellfield.

The progress of these corrective actions will be evaluated by increasing the sampling frequency for MW01-O from quarterly to monthly, until sulfate returns to concentrations below the AL. The December sample was collected on 12/13/2021 and results are pending.



Please feel free to contact me should you have any questions or comments.

Sincerely,

Florence Copper, Inc.

Brent Berg

General Manager

cc:

Nancy Rumrill, EPA Region 9

Maribeth Greenslade, ADEQ